

Huff, Gwen

From: Schaffer, Carolyn A [CSchaffer@mwdh2o.com]
Sent: Thursday, August 12, 2010 5:12 PM
To: Water Use Efficiency
Subject: MWD Comments on Urban Technical Methodologies - Public Draft (July 12, 2010)
Attachments: MWD Comments-Public DraftTechnical Methodologies.pdf

Attached are the Metropolitan Water District's comments on the Urban Technical Methodologies - Public Draft dated July 12, 2010.

Sincerely, <<MWD Comments-Public DraftTechnical Methodologies.pdf>>

Carolyn Schaffer

Associate Resource Specialist

Metropolitan Water District

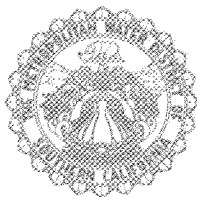
Water Resource Management - Regional Supply Unit

700 N. Alameda Street

Los Angeles, CA 90012

(213) 217-6244 or (213) 576-5190 FAX

cschaffer@mwdh2o.com



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

August 12, 2010

Mr. Manucher Alemi, Ph.D., P.E.
Chief, Water Use and Efficiency Branch
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Dear Mr. Alemi,

Comments on SBX7-7 Urban Water Use Target
Technical Methodologies Public Draft dated July 12, 2010

The Metropolitan Water District of Southern California (Metropolitan) would like to thank the Department of Water Resources (Department) for its significant efforts over the past four months to develop methodologies that support the successful implementation of SBX7-7. We commend the Department on the comprehensiveness of the Urban Water Use Target Technical Methodologies Public Draft dated July 12, 2010. The focus of our comments on the Public Draft is on regional compliance as we believe it is an essential tool for achievement of a statewide 20-percent reduction in urban per capita water use by 2020.

Regional compliance allows water suppliers to leverage existing and future collaborative efforts and partnerships based on shared investments in water use efficiency and recycled water programs. Many of these partnerships exist throughout the state and more should be encouraged. These efforts are financially feasible through economies of scale, shared infrastructure, and strategic use of resources that are not present at an individual agency level. Considerable work needs to be done across the state to achieve the 20-percent goal; flexibility with regional alliances will contribute to success.

Metropolitan requests that the Department make the following modifications to Methodology 9: Regional Compliance:

1. Participation in Multiple Regional Alliances

Retail water suppliers should have the option to participate in as many regional alliances as meet the criteria specified in SBX7-7. Limiting water suppliers to participation in only one alliance will undermine existing structures established to further conservation and water recycling. Further, it will greatly disincentivize the formation of new alliances. We believe the net effect will be lower water use efficiency.

Retail water suppliers will be reporting their individual data and compliance GPCD in their urban water management plans, which will be used to determine the state's progress towards the 20-percent goal. Participation in multiple alliances will not affect this assessment of

Mr. Manucher Alemi, Ph.D., P.E.

Page 2

August 12, 2010

statewide progress. Also, participation in multiple alliances will not lessen the work that needs to be done to achieve the state's goal. To the contrary, limiting meaningful alliances will contribute to the state missing its goal.

Alliances are increasingly important when considering eligibility for grants and loans that could be used to fund regional water system infrastructure. Limiting participation in alliances would undermine efforts to ensure eligibility throughout a water service area.

2. Data Reporting

Regional alliances that already submit a regional urban water management plan should be allowed to use this plan for reporting regional data and targets without duplicate reporting in individual plans. Individual suppliers would report their individual targets and data in their plans and reference the regional plan for the alliance's targets and data. As proposed in the Public Draft, individual suppliers would be required to report both individual and regional targets and data in their urban water management plans. Incorporating regional data and targets in individual plans will be difficult as the regional information could potentially be modified until each of the individual plans is adopted. This will avoid the need for individual plans to be amended due to subsequent changes in regional data and targets.

3. Compliance Assessment

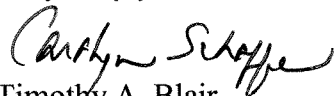
The Compliance Assessment section of the draft methodology should specify that it applies to individual retail water suppliers and regional alliances, but not to wholesale water suppliers. Wholesale water suppliers are required to incorporate an assessment of measures, programs, and policies to help achieve water use reductions in their urban water management plans, pursuant to Section 10608.36.

4. Withdrawal or Dissolution of a Regional Alliance

Submittal of a revised plan should not be mandatory if the individual water supplier targets and data are already included in the plan and will not change. The current draft would require retailers to submit a revised urban water management plan upon withdrawal from a regional alliance or dissolution of an alliance; this would require unnecessary effort if the individual data is unchanged. Written notification to the Department of the change in alliance participation or dissolution should be sufficient.

Thank you for the opportunity to provide comments. If you have any questions, please feel free to contact me at (213) 217-6613 or via email at tblair@mwdh2o.com.

Very truly yours,


for Timothy A. Blair
Manager, Water Use Efficiency

CS:jc

o:\a\s\c\2010\CS_Comments on Public Draft Urban Water Use Technical Methodologies 08-12-10.doc